



UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	Order Filed on March 22, 2017 by Clerk U.S. Bankruptcy Court District of New Jersey
Robertson, Anschutz & Schneid, P.L. 6409 Congress Ave., Suite 100 Boca Raton, FL 33487 Telephone Number 561-241-6901 Attorneys For Secured Creditor	CASE NO.: 16-14196-MBK
JUSTIN D. PLEAN, Esq. (JP - 5835)	CHAPTER 13
In Re: Karen M. Prokonus Debtor.	JUDGE: Michael B. Kaplan

CORRECTED

CONSENT AGREED ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF
FROM THE AUTOMATIC STAY

The relief set forth on the following pages, numbered two (2) through four (4), is hereby

ORDERED.

DATED: March 22, 2017

A handwritten signature in black ink, appearing to read "Michael B. Kaplan".

Honorable Michael B. Kaplan
United States Bankruptcy Judge

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Debtors: Karen M. Prokapus,

Case No.: 16-14196-MBK

Caption of Order: **Consent Order Resolving Motion for Relief from Stay**

Upon the Motion of U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR STRUCTURED ASSET INVESTMENT LOAN TRUST, MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2003-BC8 by its servicer, Ocwen Loan Servicing, LLC (“Secured Creditor”), through its counsel, Robertson, Anschutz & Schneid, P.L., attorneys for Secured Creditor under Bankruptcy Code 11 U.S.C. 362(d), for relief from the automatic stay as to certain property located at 110 Jackson Road, Berlin, NJ 08009, (“Property”), and the entry of the Order settling the Motion for Relief and for cause shown, it is hereby ORDERED and DECREED as follows:

1. As of the date of this Order, Debtor acknowledges that the subject loan is due for the following post-petition regular monthly payments:

Monthly payments:.....	09/01/2016 – 02/01/2017
Monthly payments due: (\$920.03 x 4)	
(\$1,010.37 x 1)	
(\$1,004.78 x 1)	\$5,695.27
Attorneys' Fees and Costs of Motion.....	\$531.00
Amounts Held in Suspense.....	\$61.11
Total Amount to Cure.....	\$6,165.16

2. The balance of post-petition arrears totaling \$6,165.16 shall have a lump sum payment in the amount of \$1,500 paid directly to Secured Creditor with the remaining balance to be included into the Chapter 13 Plan.
3. Within fourteen (14) days of entrance of this Order Debtor shall file an amended Chapter 13 Plan to include the remaining \$4,665.16 in post-petition arrears into the Plan.
4. In the event that Secured Creditor alleges that Debtor has failed to comply with obligations under this Consent Order, Secured Creditor and/or Counsel may give Debtor

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Caption of Order: Consent Order Resolving Motion for Relief from Stay

and Debtor's Counsel notice of the default and if such default is not cured within ten (10) days of said notice, upon certification to the Court of such default, and request for Order, with a copy to Debtor and Debtor's counsel, the Court may grant Secured Creditor's immediate relief from the bankruptcy stay. Debtor shall pay \$50.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

5. The failure by the Secured Creditor, at any time, to file a Certification of Default upon default by the Debtor shall not be construed, nor shall such failure act, as a waiver of any of Secured Creditor's rights hereunder. In the event Debtor fails to comply with the terms of this Order for more than 30 days, Secured Creditor may submit a certification of default and proposed Order for Relief from the Automatic Stay to the Court and serve a copy of such Certification of Default upon the Debtor and Debtor's Counsel. Fourteen days after receipt of the Certification of Default, the Court will enter an Order granting Secured Creditor relief from the automatic stay unless the Debtor has filed an objection to the

Certification of Default specifying reasons for the objection; in which case the Court will set a hearing on the objection.

6. Upon issuance of the Order, the parties hereto further agree that Secured Creditor may proceed in state court to exercise all rights and remedies available to it as a mortgagee and continuation of foreclosure and execution process through Sheriff's sale concerning the Property and ejectment thereafter.

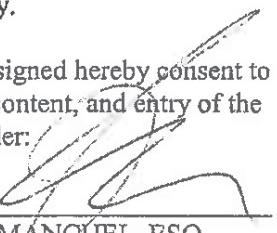
Page 4

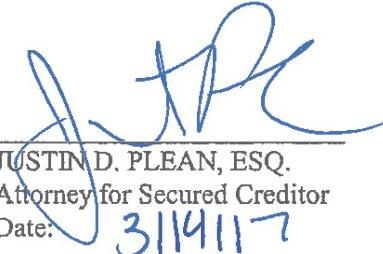
Debtors: Karen M. Prokapus,
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Caption of Order: Consent Order Resolving Motion for Relief from Stay

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7. In the event the Debtor converts to a bankruptcy under Chapter 7 of the Bankruptcy Code, then Debtor shall pay all pre-petition and post-petition arrears within 10 days from the date the case is converted. If Debtor fails to make payments in accordance with this paragraph then Secured Creditor, through Counsel, may file a certification setting forth said failure and the Secured Creditor shall be granted immediate relief from the automatic stay.

The undersigned hereby consent to the form, content, and entry of the within Order:


ROBERT MANCHEL, ESQ.
Attorney for Debtor
Date:


JUSTIN D. PLEAN, ESQ.
Attorney for Secured Creditor
Date: 3/19/17

Certificate of Notice Page 5 of 5
United States Bankruptcy Court
District of New Jersey

In re:
 Karen M. Prokapus
 Debtor

Case No. 16-14196-MBK
 Chapter 13

CERTIFICATE OF NOTICE

District/off: 0312-3

User: admin
Form ID: pdf903Page 1 of 1
Total Noticed: 1

Date Rcvd: Mar 22, 2017

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Mar 24, 2017.

db +Karen M. Prokapus, 32 High Point Drive, Medford, NJ 08055-3816

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE.

TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Mar 24, 2017

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on March 22, 2017 at the address(es) listed below:

Albert Russo on behalf of Trustee Albert Russo docs@russotrustee.com
 Albert Russo docs@russotrustee.com
 Denise E. Carlon on behalf of Creditor Wilmington Savings Fund Society, Et Al...
 dcarlon@kmllawgroup.com, bkgroup@kmllawgroup.com
 Joshua I. Goldman on behalf of Creditor Wilmington Savings Fund Society, Et Al...
 jgoldman@kmllawgroup.com, bkgroup@kmllawgroup.com
 Justin Plean on behalf of Creditor The Bank of New York Mellon jplean@rasflaw.com,
 bkyecf@rasflaw.com;ras@ecf.courtdrive.com
 Justin Plean on behalf of Creditor THE BANK OF NEW YORK MELLON jplean@rasflaw.com,
 bkyecf@rasflaw.com;ras@ecf.courtdrive.com
 Patrick O. Lacsina on behalf of Creditor The Bank of New York Mellon gshasa@rasnj.com,
 bmusarra@rasnj.com,bkyecf@rasflaw.com,legerman@rasnj.com
 Robert Manchel on behalf of Debtor Karen M. Prokapus manchellaw@yahoo.com
 William M.E. Powers on behalf of Creditor Wells Fargo Bank, N.A. ecf@powerskirkn.com
 William M.E. Powers, III on behalf of Creditor Wells Fargo Bank, N.A. ecf@powerskirkn.com
 TOTAL: 10